

PRIVACY POLICY

INTRODUCTION

Rubio Media LTD. (“us“, "our", “we” or “Company“) is the owner and developer of proprietary technology and integration intended to convert articles and similar content to audio ("Technology").The technology is implemented by Company’s business partners in their websites or other digital assets (“Business Partners” and “Digital Assets” respectively), enabling their Digital Assets’ end user (“Users”) to listen to the content available therein. The Company also allows for third party advertisers ("Advertisers") to provide advertisements ("Ads") through its Technology (collectively with the Technology, "Services").

This privacy policy (“Privacy Policy”) governs our privacy and data collection practices with respect to the data we collect from individuals who access and use our website available at: rubio.ai("Visitors"), our Business Partners who use and register for our Services and their Users interacting with the Technology. Each of the Business Partners, Users, and Visitors shall also be referred to herein as “you”.

This Privacy Policy will explain what information we may collect from our Visitors, Business Partners and their Users, how such information may be used or shared with others, how we safeguard it and how each of the aforementioned individuals may exercise their rights related to their Personal Data (as such term is defined below) in accordance with applicable data protection laws including, but not limited to, the EU General Data Protection Regulation(“GDPR”) and the California Consumer Privacy Act (“CCPA”). We highly encourage you to read the Privacy Policy carefully and use it to make informed decisions before you access our Website or use any of our Services.

If you are a California resident, the CCPA may apply to you as well. Please review our CCPA Privacy Notice to learn more.

This Privacy Policy will include, but is not limited to, the following information:

- (i) Our lawful basis for processing your Personal Data;
- (ii) What type of data we collect and how we use such data;
- (iii) Cookies and how we collect your data;
- (iv) With whom we share your data and for what purpose;
- (v) Your privacy rights;
- (vi) Our data retention practices;
- (vii) Our direct marketing practices;
- (viii) How we protect your data;
- (ix) International transfer of your data;
- (x) Children;
- (xi) How to contact us;

LAWFUL BASIS

Subject to applicable law (and specifically the GDPR), our lawful basis for processing Personal Data is as follows:

- (i) We process certain Online Identifiers (as described below) during a Visitor's use of our website and for functionality and operational purposes, which we have a legitimate interest in processing;
- (ii) We process a Business Partner's Personal Data when they use our Services in order to perform our Contract with them;
- (iii) We (or the Advertisers) may use cookies for advertising purposes, which, subject to applicable law requirements, your consent will be requested by the Business Partners in order for us to do so; and
- (iv) In the event you contact us, we will process your contact details and other information you choose to provide us with in order to perform our contract with you.

WHAT TYPE OF DATA DO WE COLLECT?

If you are a Visitor, User or Business Partner, we may collect one or both of the following types of data from you when you use or access our website, the Services or when you interact with the Technology, as applicable.

The first type of data is aggregated, non-personal, non-identifiable information pertaining to your use of the website or interaction with the Technology (“Non-personal Data”). We are not aware of the identity of the individual from which the Non-personal Data is collected. Non-Personal Data may include your aggregated usage information and technical information transmitted by your device, including certain software and hardware information about your device (e.g., the device you use, the type of browser and operating system your device uses, language preferences, access times and the website’s domain name from which you accessed the Services, etc.), in order to enhance the functionality of the Services and for security and functionality purposes. We may also collect information about your activity on the Services (e.g., clicks, ads shown, etc.). The second type of information is individually identifiable information, namely information that identifies an individual or may with reasonable effort identify an individual (“Personal Data”). For the avoidance of doubt, if we combine Personal Data with Non-personal Data, the combined data will be treated as Personal Data as long as the data types remain combined.